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NATIONWIDE INSURANCE COMPANY
OF AMERICA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AHMER BILAL, INC. dba TIRE DEPOT,

Plaintiff,

vs.

NATIONWIDE INSURANCE COMPANY
OF AMERICA; and DOES 1 through 30,
inclusive,

Defendants.

Case No. 2:20-cv-00788-TLN-DMC

**STIPULATION AND ORDER TO
CONTINUE CASE DEADLINES**

Plaintiff Ahmer Bilal dba Tire Depot and defendant Nationwide Insurance Company of America, by and through their respective counsel of record, stipulate and agree as follows and respectfully request entry of an order giving effect to their stipulation:

WHEREAS, the parties stipulated to a case management schedule on August 5, 2021, which the Court approved in an August 6, 2021 order (*see* ECF Dkt. No. 9);

WHEREAS, the Court approved the parties' stipulation to continue the deadlines in the August 6, 2021 order by 120 days (*see* ECF Dkt. No. 11);

WHEREAS, the parties have continued to engage in discovery during this period, including scheduling and taking depositions of multiple witnesses;

WHEREAS, the parties are continuing to explore mediation as a means of resolving their disputes;

WHEREAS, a continuance of the discovery deadline and, as a result, other case deadlines is necessary to provide the parties with adequate time to explore potential case resolution and to avoid unproductive proceedings and unnecessary litigation costs;

WHEREAS, the parties agree that the interests of judicial economy, efficiency and convenience of the Court and the parties would be furthered by continuing the dates in the Court's March 16, 2022 order (ECF Dkt. No. 11) by 90 days, as follows:

	Original Deadline	Proposed Deadline (Adding 90 Days)
Non-Expert Discovery Cut-Off	Wednesday, September 7, 2022	Tuesday, December 6, 2022
Designation of Expert Witnesses	Tuesday, November 8, 2022	Monday, February 6, 2023
Designation of Rebuttal Experts	Thursday, December 8, 2022	Wednesday, March 8, 2023
Expert Discovery Cut-Off	Tuesday, December 6, 2022	Monday, March 6, 2023
Discovery Motion Hearing Cut-Off	Friday, February 17, 2023	Thursday, May 18, 2023

Joint Notice of Trial	30 Days After Ruling on	30 Days After Ruling on
Readiness	Dispositive Motions	Dispositive Motions

WHEREAS, the parties agree that all other case deadlines, including trial and motion deadlines, and dates imposed by order, local rules, or otherwise, shall be reset in accordance with the 90 day continuance requested;

NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

The deadlines in this matter, set forth in the Court's March 16, 2022 order and all other case deadlines be continued by 90 days as set forth in part in the table above, or as soon thereafter as the Court's calendar allows. Alternatively, the parties respectfully request that the Court set a further case management conference at which new dates may be selected.

The parties respectfully request the Court to adopt the foregoing stipulation as the order of the Court.

IT IS SO STIPULATED.

Dated: May 19, 2022

Respectfully submitted,
RICHARDS WILLIS, PC

By /s/ _____
EVAN WILLIS

Attorneys for Plaintiff
AHMER BILAL, INC. dba TIRE DEPOT

Dated: May 20, 2022

DENTONS US LLP

By /s/ _____
JONE TRAN

Attorneys for Defendant
NATIONWIDE INSURANCE COMPANY OF
AMERICA

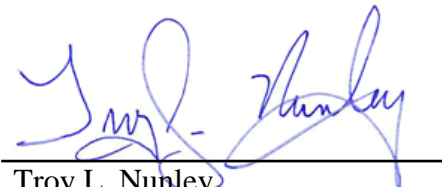
ORDER

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth in the Court's March 16, 2022 order and all other case deadlines by 90 days, in part, as follows:

Non-Expert Discovery Cut-Off	Tuesday, December 6, 2022
Designation of Expert Witnesses	Monday, February 6, 2023
Designation of Rebuttal Experts	Wednesday, March 8, 2023
Expert Discovery Cut-Off	Monday, March 6, 2023
Discovery Motion Hearing Cut-Off	Thursday, May 18, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions

IT IS SO ORDERED.

Dated: May 20, 2022



Troy L. Nunley
United States District Judge

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